

**Dash Carrier Services, LLC**

**Annual CPNI Certification**

**47 C.F.R. §64.2009(e)**

**EB Docket No. 06-36**

Annual 64.2009(e) CPNI certification for **December 31, 2010**

**COMPANY NAME:** Dash Carrier Services, LLC

**FILER ID:** 826605

**OFFICER:** Kevin Breault

**TITLE:** Vice President of Sales/Business Development

I, Kevin Breault, hereby certify that I am an officer of Dash Carrier Services, LLC ("Dash Carrier Services") and that I am authorized to make this certification on behalf of Dash Carrier Services. I have personal knowledge that Dash Carrier Services has established operating procedures that are adequate to ensure compliance with the Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Dash Carrier Services or to any of the information obtained by Dash Carrier Services. *See* 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Dash Carrier Services employs to ensure that it complies with the requirements set forth in §64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Dash Carrier Services or to the information obtained by Dash Carrier Services.

Signed: Kevin Breault

Date: 02/18/11

## **Dash Carrier Services, LLC**

### **Statement of CPNI Procedures and Compliance**

Dash Carrier Services, LLC ("Dash Carrier Services") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, Dash Carrier Services does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. Dash Carrier Services does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. Dash Carrier Services typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

Dash Carrier Services may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because Dash Carrier Services provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by Dash Carrier Services is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

Dash Carrier Services safeguards from improper use or disclosure by employees the call detail information that Dash Carrier Services obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, Dash Carrier Services has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to Dash Carrier Services computers and call detail records. In the event of unauthorized CPNI access, Dash Carrier Services will notify the requisite law enforcement agencies, and the customer when possible.

Dash Carrier Services did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Dash Carrier Services does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through Dash Carrier Services, it cannot notify those end-user customers directly if a breach occurs. However, Dash Carrier Services has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.